

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2017-228-S**

IN RE: )  
 )  
 Application of Palmetto Utilities, Inc. )  
 for adjustment of rates and charges )  
 for, and modification to certain terms )  
 and conditions related to, )  
the provision of sewer service. )

**PREFILED DIRECT TESTIMONY**  
**OF MARION F. SADLER, JR.**  
**ON BEHALF OF PALMETTO**  
**UTILITIES, INC.**

1 **Q. WOULD YOU PLEASE STATE YOUR FULL NAME AND PRESENT**  
 2 **POSITION?**

3 A. My name is Marion F. Sadler, Jr. I am retired from the South Carolina  
 4 Department of Health and Environmental Control ("DHEC") and provide  
 5 environmental and utility consulting services in the State of South Carolina  
 6 through my sole proprietorship, "Sadler Environmental Assistance."

7 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

8 A. I received a Bachelor of Science degree in Mechanical Engineering from  
 9 Clemson University in 1971. I received a Master of Engineering degree in  
 10 Environmental Systems Engineering, also from Clemson University, in 1981.

11 **Q. HOW LONG DID YOU WORK AT DHEC?**

12 A. I worked at DHEC and one of its predecessor agencies for my entire  
 13 career, which was 34 ½ years.

1   **Q.     WOULD YOU PLEASE DESCRIBE YOUR WORK EXPERIENCE?**

2   A.           Yes.    I began working with the South Carolina Board of Health as an  
3           Environmental Engineer Associate in July 1971. In this capacity I was the District  
4           Director in the Lower Savannah District Office, which covered Orangeburg,  
5           Bamberg, and Calhoun Counties, where I was responsible for the field work of  
6           the water supply, domestic wastewater, and swimming pool programs.

7           In 1972, I transferred to the Domestic Wastewater Division in the main  
8           Columbia office, where I was a plan reviewer of private wastewater collection  
9           and treatment systems throughout South Carolina.

10          In 1973, the South Carolina Pollution Control Authority (the "PCA") was  
11          merged with the Board of Health, and the combined agencies were re-formed as  
12          DHEC. As a result of that restructuring, I became District Director of the Central  
13          Midlands Environmental Quality Control District Office, which covered  
14          Richland, Lexington, Newberry, and Fairfield Counties. In this capacity I was  
15          responsible for the field work of the water supply, wastewater, and swimming  
16          pool programs.

17          In August of 1974, I became Section Manager of the Community Section  
18          of the Domestic Wastewater Division, Bureau of Water Pollution Control for  
19          DHEC. In this capacity I was responsible for permitting activities of domestic  
20          wastewater collection and treatment systems throughout the State of South  
21          Carolina, except for those owned by municipalities, counties, the federal  
22          government, and industries. In this position, I supervised up to five plan reviewers  
23          and was responsible for administering and developing the statewide program

1 through regulations, program guidance memorandums, etc. I played a key role in  
2 the adoption of these items into SC Regulation 61-67, Standards for Wastewater  
3 Facility Construction. Also, I was involved in the development and promulgation  
4 of SC Regulation 61-82, Proper Closeout of Wastewater Treatment Facilities. In  
5 this capacity, I conducted numerous public hearings and testified in proceedings  
6 before courts and administrative bodies. During this time, I also testified in rate  
7 relief hearings before the Public Service Commission of South Carolina (the  
8 “Commission”).

9 In September of 1991, I became Director of the Industrial, Storm Water,  
10 and Agricultural Permitting Division, which position I held until my retirement  
11 from DHEC in 2005. In that capacity I was responsible for the permitting  
12 activities of entities involved in the treatment or discharge of industrial  
13 wastewater, which included land appliers, direct dischargers, and pre-treaters of  
14 non-domestic wastewater. The Storm Water Program I oversaw involved three  
15 separate permitting programs: the Industrial, Construction, and Municipal  
16 Separate Storm Sewer Systems (MS4s) program; the Agricultural program; and  
17 the Dams and Reservoirs Permitting program. In this position, I supervised up to  
18 twenty-six staff members in four sections and was responsible for administering  
19 and developing these statewide programs through regulations, program guidance  
20 memorandums, etc. I was also responsible for implementation of the Federal  
21 National Pollutant Discharge Elimination Systems (“NPDES”) component of  
22 these three state programs and I interfaced with the Federal agency charged with  
23 administering the NPDES program, the Environmental Protection Agency

1 (“EPA”) in its oversight role. Further, I led and assisted in the development of  
2 regulations for these programs. I conducted public hearings, testified in court  
3 proceedings, made presentations to various concerned organizations, updated state  
4 regulations, and appeared before legislative committees on various issues. I also  
5 developed web pages and guidance documents for the program areas under my  
6 responsibility.

7 **Q. WOULD YOU PLEASE DESCRIBE THE CONSULTING WORK YOU**  
8 **HAVE BEEN DOING SINCE YOU RETIRED FROM DHEC?**

9 A. Yes. I have worked with both governmental and private entities on  
10 environmental issues such as wastewater permit applications to DHEC, stream  
11 buffer ordinances, and NPDES permit matters. Most recently I have been retained  
12 to provide consulting services in connection with the application of Palmetto  
13 Utilities, Inc. (“Palmetto”) to this Commission for rate relief.

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
15 **PROCEEDING?**

16 A. The purpose of my testimony is to describe the services I have performed  
17 relative to proposed modifications to Palmetto’s rate schedule to transition the  
18 commercial and multi-family customer rates in the former Palmetto of Richland  
19 County (“PRC”) service area (denominated based on equivalencies to residential  
20 connections), to Palmetto’s current Commission-approved rate structure.

1 **Q. WOULD YOU PLEASE DESCRIBE THE SERVICES YOU PROVIDED IN**  
2 **CONNECTION WITH THIS CASE?**

3 A. I was retained to assist Palmetto in conducting a field survey of the  
4 commercial and multi-family customers served by the legacy PRC portion of the  
5 Palmetto sewer system. The primary purpose of the survey was to determine the  
6 type, size, and scope of the business conducted by each commercial customer and  
7 to perform a count of the multi-family customers. It was necessary to perform this  
8 survey so that Palmetto could propose a transition from the current commercial  
9 customer rate design applicable to the PRC service area, which was the rate  
10 design used by the City of Columbia at the time the PRC customers were acquired  
11 by Palmetto from the City of Columbia in 2013, to Palmetto's rate structure  
12 previously approved by the Commission. Specifically, this survey was intended to  
13 support transitioning to a commercial customer equivalency rating system that is  
14 consistent with the Unit Contributory Loading Guidelines set out in Appendix A  
15 of DHEC Regulation 61-67, which are based solely upon hydraulic flow and have  
16 been recognized by this Commission in rate designs for a number of public  
17 utilities providing wastewater service. Using the findings of the survey, Palmetto  
18 was able to determine the hydraulic loading factors applicable to each type of  
19 commercial customer under Appendix A of DHEC Regulation 61-67. The survey  
20 process also allowed Palmetto to identify commercial premises connected to the  
21 Palmetto system which did not have customer accounts established with Palmetto,  
22 eliminate customers that were being billed as sewer customers but were on septic,  
23 and to verify existing business names and confirm the nature of the business being

1 conducted at customer premises, and to cross check commercial customer  
2 locations against Palmetto's billing records.

3 **Q. WOULD YOU PLEASE DISCUSS YOUR PREVIOUS SPECIFIC**  
4 **KNOWLEDGE OR EXPERIENCE THAT QUALIFIED YOU TO**  
5 **PROVIDE THE CONSULTING SERVICES IN THIS MATTER THAT**  
6 **YOU HAVE DESCRIBED?**

7 A. Yes. When I worked in the Domestic Wastewater Division, I used the Unit  
8 Contributory Loading Guidelines (that later were adopted into DHEC Regulation  
9 61-67) for 18 years on a routine basis. Being responsible for the statewide  
10 permitting of all private wastewater systems, I personally reviewed and/or  
11 supervised the personnel who reviewed all of the wastewater plans that were  
12 submitted to DHEC for approval by professional engineers.

13 Finally, as Section Manager of the Community Section from 1974 to  
14 1991, I have testified before the Commission on numerous rate hearings for  
15 investor-owned wastewater utilities with respect to the utilities' overall operation  
16 and maintenance of their wastewater systems and compliance with their NPDES  
17 Permits issued by DHEC.

18 **Q. WOULD YOU PLEASE EXPLAIN HOW THE UNIT CONTRIBUTORY**  
19 **GUIDELINES IN APPENDIX A TO REGULATION 61-67 WERE**  
20 **DEVELOPED AND HOW THEY ARE CURRENTLY USED?**

21 A. Yes. To understand this, I think it is important to first understand some of  
22 the background regarding the original Unit Contributory Loading Guidelines. The  
23 staff of the PCA developed the original Unit Contributory Loading Guidelines

1 from a review it performed of wastewater text/reference books commonly used in  
2 the wastewater engineering and science field.

3 From this review, the typical hydraulic (flow) loadings and organic  
4 (BOD<sub>5</sub>) loadings listed in the textbooks were established by the PCA staff for  
5 different types of commercial and industrial establishments, residential projects,  
6 schools, etc. These typical textbook loading factors were published in the early  
7 1970s by the PCA as a guidance document for use by consulting engineers and  
8 their staff. The staff of the Board of Health, which included me and my staff, also  
9 utilized this document in our work since both agencies were required by state law  
10 to issue wastewater construction permits for proposed subdivisions with 250 or  
11 more lots. After the merger of these two agencies to form DHEC, the guidance  
12 document with both the hydraulic and organic loading rates was included in  
13 DHEC Regulation 61-67. Since then, DHEC has amended SC Regulation 61-67  
14 by removing the organic loading factor from the Unit Contributory Loadings  
15 given in Appendix A to the regulation.

16 In 2015, DHEC further amended Appendix A to SC Regulation 61-67 to  
17 reduce by a factor of 25% the number of gallons applicable to each of the loading  
18 categories and to modify some of the loadings. With regard to the latter, one such  
19 modification was to eliminate any loading for cars served by a fast food restaurant  
20 drive-thru window. Another involved a modification to the loading factors for  
21 shopping centers. Copies of the original Unit Contributory Loading Guidelines  
22 developed by the PCA and the as-amended guidelines contained in Appendix A to

1 DHEC Regulation 61-67 are attached to my testimony as Exhibits MFS-1 and  
2 MFS-2, respectively.

3 **Q. DID YOU PARTICIPATE IN THE SURVEY OF COMMERCIAL**  
4 **CUSTOMERS THAT YOU MENTIONED?**

5 A. Yes, I did.

6 **Q. WOULD YOU PLEASE PROVIDE THE DETAILS OF HOW THE**  
7 **COMMERCIAL CUSTOMER SURVEY WAS CONDUCTED?**

8 A. Yes. The survey involved three separate phases. The first phase dealt with  
9 preparing for the actual field work. This commenced with Palmetto providing to  
10 me an electronic file containing a list of all commercial customers in the PRC  
11 portion of its service territory, which included the names of the establishments  
12 and related service addresses. The file listed restaurants and all other commercial  
13 customers separately. Also during the first phase, Palmetto provided two forms  
14 for use by the field survey team when conducting the physical inspection of  
15 commercial customer premises. One form was a "Commercial Customer  
16 Inspection Checklist" which was designed to capture basic customer information  
17 and document the particulars of the inspection. This form was also used to record  
18 the type of commercial establishment maintained by the customer and to capture  
19 information regarding the hydraulic loading factors from Appendix A of SC  
20 Regulation 61-67 applicable to the type of establishment, grease trap and satellite  
21 sewer information where applicable, and any other pertinent information. A copy  
22 of this form is attached to my testimony as Exhibit MFS-3. The other form was a  
23 "Shopping Center Supplement Inspection Checklist" developed for use when the



1 commercial customer location was a shopping center with multiple tenants. This  
2 form was used to record the shopping center name, location address, exterior  
3 square footage, number of separate units in the shopping center, names of  
4 tenants/stores and tenant contact information, tenant establishment type, hydraulic  
5 loading factors from Appendix A of SC Regulation 61-67 based on the type of  
6 establishment, and outparcel information. A copy of this form is attached to my  
7 testimony as Exhibit MFS-4.

8 Also during the first phase, Palmetto provided a letter of introduction for  
9 the field survey team members to give to commercial customers so that they  
10 would understand the nature of the survey and associated inspection. The letter  
11 asked for the cooperation of the commercial customers with Palmetto  
12 representatives. Palmetto also made available an information sheet on the right of  
13 access accorded public utilities under Commission regulations to inspect customer  
14 premises. This letter was to be provided to any customer that was hesitant to  
15 allow the inspection. Copies of both of these documents are attached to my  
16 testimony as Exhibits MFS-5 and MFS-6, respectively. All field survey team  
17 members were provided with utility contractor identification cards, which  
18 included photographs, to clearly and readily identify them as such to customers.

19 The last step in the first phase of the survey was to sort the electronic file  
20 of commercial customer locations by street number plus street name so that the  
21 commercial customer location inspections could be conducted as efficiently as  
22 possible. The list of commercial customers was then divided up into three (3)  
23 parts to be assigned to the members of the field survey team.

1           The second phase of the survey was to conduct the actual inspections of,  
2           and gather information regarding, the commercial customer locations. The field  
3           survey team consisted of six people which included Mr. Benny Wilkinson, VP of  
4           Financial Due Diligence for Ni America Operating LLC, Mr. Tim Thornton, an  
5           inspector employed by Ni America Operating LLC in the grease removal and  
6           reduction program, April Braswell, Billing Manager, Derek Chance, Field  
7           Customer Service Technician, Med Uddin, a contractor for Billing and Customer  
8           Service, and me. Prior to the field survey and inspections, Palmetto conducted a  
9           training session for all of the survey team members to explain how the survey and  
10          inspections were to be conducted; to instruct them in the use of the two inspection  
11          forms I described; to educate them with respect to the Unit Contributory Loadings  
12          in Appendix A of Regulation 61-67; and to describe to them how to apply the  
13          equivalency loading factors under Appendix A to Regulation 61-67 to commercial  
14          customers when filling out the inspection forms. The survey team members were  
15          instructed to be courteous, considerate of commercial customer representatives  
16          participating in the survey with respect to the time required of them and the  
17          operation of their businesses, and to conduct themselves in a professional manner.  
18          Also, each team was encouraged to take pictures of the exterior and interior of the  
19          commercial customer premises if this was agreeable to the customer.

20          Three field teams of two people each were established. Mr. Wilkinson and  
21          I made up one team and we also supervised the gathering of the field surveys  
22          from the other teams. Each day the completed survey forms were turned in and  
23          any issues that arose during the day were discussed. I also reviewed the completed

1 surveys to make sure all necessary information had been obtained. If there were  
2 any questions on a completed survey it was discussed with the applicable team  
3 members and, if necessary, a follow-up inspection or telephone call to the  
4 commercial customer premises was made to resolve the question.

5 The commercial customer premises were inspected by the three teams  
6 during a two-week period beginning April 24, 2017. Additional follow-up  
7 inspections were made over the next two months, on an as needed basis.

8 The third phase of the survey involved the assimilation of the inspection  
9 and field survey results documentation and analysis of the information obtained.  
10 After the completion of all inspections, the completed forms were provided to  
11 Palmetto for its evaluation and use in developing a proposed rate design for  
12 commercial customers in the PRC portion of the service area based upon  
13 equivalency ratings using hydraulic flows provided for in Appendix A to DHEC  
14 Regulation 61-67. Single Family Equivalent (SFE) ratings were also calculated  
15 for each commercial customer using the loading guideline factors set out in  
16 Appendix A to Regulation 61-67.

17 **Q. WHAT WERE THE RESULTS OF THE PRC CUSTOMER SURVEY?**

18 A. The initial results of the customer survey reflected 786.61 commercial  
19 SFEs and 591.63 multi-family SFEs. When combined with the 11,700.00 single-  
20 family residences, this resulted in 13,078.24 SFEs for PRC. Palmetto uses SFEs  
21 and Equivalent Residential Connections (ERCs) interchangeably. One change to  
22 these results is necessary, however.

1   **Q.     WHAT IS THAT CHANGE?**

2   A.           The ERCs for a customer in the PRC portion of the service area operating  
3           a fast-food restaurant that advertises 24-hour service was calculated in accordance  
4           with the provisions of R.61-67, Appendix A, part FF.2. Subsequent to the  
5           completion of the study, it was determined that this customer's restaurant dining  
6           area was not actually open on a 24-hour basis and instead served customers  
7           through a drive-thru window during early morning hours when the dining area  
8           was closed.

9           Because the 2015 amendment to R.61-67, Appendix A does not provide  
10          for a hydraulic load factor for drive-thru windows, it was necessary to re-calculate  
11          the ERCs for this customer under R.61-67, Appendix A, FF.1. As a result, the  
12          customer's ERC rating has been changed from 14.13 ERCs to 8.0 ERCs. This  
13          reduced total commercial ERCs to 780.48 and total ERCs to 13,072.11.

14   **Q.     DOES THIS CONCLUDE YOUR TESTIMONY?**

15   A.           Yes, it does.

**GUIDELINES  
for  
UNIT CONTRIBUTORY LOADINGS  
to  
WASTEWATER TREATMENT FACILITIES**



**WATER POLLUTION CONTROL DIVISION**

*South Carolina  
Pollution Control Authority  
1972*

**SCPCA-WDG-4**  
**SOUTH CAROLINA**  
**POLLUTION CONTROL AUTHORITY**  
**Water Pollution Control Division**  
**Guidelines for**

**Unit Contributory Loadings to Wastewater Treatment Facilities**

The following are guidelines for the *minimum* design loadings for waste treatment facilities. These guidelines will be used by the South Carolina Pollution Control Authority in evaluating proposed facilities.

<i>Type of Establishment</i>	<i>Gallons Per Day Per Person</i>	<i>Lbs. 5-Day BOD Per Day Per Person</i>
Airport — Each Employee .....	10	.06
— Each Passenger .....	5	.02
Apartments — 3 Bedroom 4 Persons Each .....	100	.17
— 2 Bedroom 3 Persons Each .....	100	.17
— 1 Bedroom 2 Persons Each .....	100	.17
— With Garbage Disposal Units .....	100	.23
Bars — Each Employee .....	10	.06
— Each Seat (Excluding Restaurant) .....	40	.01
Boarding House — Resident .....	50	.10
Bowling Alley — Per Lane (No Restaurant) .....	125	.20
— Additional For Bars and Cocktail Lounges .....	3	.02
Camps — Resort (Luxury) .....	100	.17
— Summer .....	50	.12
— Day (With Central Bathhouse) .....	35	.10
— Per Travel Trailer Site .....	175	.28
Churches — Per Seat .....	3	.02
Clinics — Per Staff .....	15	.03
— Per Patient .....	5	.02
Country Club — Each Member .....	50	.10
Factories — Each Employee (No Showers) .....	25	.06
— Each Employee (With Showers) .....	35	.08
— Each Employee (With Kitchen Facilities) ..	40	.10
Fairgrounds — Average Attendance .....	5	.03
Food Service Operations —		
Ordinary Restaurant (Not 24 Hours) (Per Seat) .....	70	.20
24-Hour Restaurant (Per Seat) .....	100	.30
Curb Service (Drive-in) (Per Car Space) .....	100	.20
Vending Machine Restaurant .....	70	.12

<i>Type of Establishment</i>	<i>Gallons Per Day Per Person</i>	<i>Lbs. 5-Day BOD Per Day Per Person</i>
Hospitals — Per Bed .....	200	.30
— Per Resident Staff .....	100	.17
Hotels — Per Bedroom (No Restaurant) .....	100	.17
Institutions — Per Resident .....	100	.17
Laundries — Self Service — Per Machine .....	400	.68
Mobile Homes — 3 Persons Each .....	100	.17
Motels — Per Unit (No Restaurant) .....	100	.17
Nursing Homes — Per Bed (No Laundry) .....	100	.17
— Per Bed (With Laundry) .....	150	.20
Offices — Per Person (No Restaurant) .....	25	.05
Picnic Parks — Average Attendance .....	10	.06
Residences — 4 Persons Each .....	100	.17
— With Garbage Disposal Units .....	100	.23
Rest Homes — Per Bed (No Laundry) .....	100	.17
— Per Bed (With Laundry) .....	150	.20
Schools — Per Person (No Showers, Gym, Cafeteria) .....	10	.04
— Per Person With Cafeteria (No Gym, Showers) .....	15	.05
— Per Person With Cafeteria, Gym & Showers .....	20	.06
Service Stations — Each Car Served .....	10	.06
— Each Car Washed .....	75	.03
— First Bay (Per Day) .....	1000	2.0
— Each Additional Bay (Per Day) .....	500	1.0
Shopping Centers — Per 1,000 Sq. Ft. Space (No Restaurant) .....	200	.40
Stadiums — Per Seat (No Restaurant) .....	2	.008
Swimming Pools — Per Person (With Sanitary Facilities and Showers) .....	10	.04
Theatres — Drive-In — Stall .....	5	.03
— Indoor — Seat .....	5	.03

Any major deviation from the above guidelines should be so noted and substantiated by the Engineer in the project report.



**61-67, Appendix A. Unit Contributory Loadings to All Domestic Wastewater Treatment Facilities**

<b>Unit Contributory Loadings to All Domestic Wastewater Treatment Facilities</b>	
<b>Type of Establishment</b>	<b>Hydraulic Loading (GPD)</b>
A. Airport:	
1. Per Employee	8
2. Per Passenger	4
B. Apartments, Condominiums, Patio Homes:	
1. Three (3) Bedrooms (Per Unit)	300
2. Two (2) Bedrooms (Per Unit)	225
3. One (1) Bedroom (Per Unit)	150
C. Assembly Halls: (Per Seat)	4
D. Barber Shop:	
1. Per Employee	8
2. Per Chair	75
E. Bars, Taverns:	
1. Per Employee	8
2. Per Seat, Excluding Restaurant	30
F. Beauty Shop:	
1. Per Employee	8
2. Per Chair	94
G. Boarding House, Dormitory: (Per Resident)	38
H. Bowling Alley:	
1. Per Employee	8
2. Per Lane, No Restaurant, Bar or Lounge	94
I. Camps:	
1. Resort, Luxury (Per Person)	75
2. Summer (Per Person)	38
3. Day, with Central Bathhouse (Per Person)	26
4. Travel Trailer (Per Site)	131
J. Car Wash: (Per Car Washed)	56
K. Churches: (Per Seat)	2
L. Clinics, Doctor's Office:	
1. Per Employee	11
2. Per Patient	4
M. Country Club, Fitness Center, Spa: (Per Member)	38



N. Dentist Office:	
1. Per Employee	11
2. Per Chair	6
3. Per Suction Unit; Standard Unit	278
4. Per Suction Unit; Recycling Unit	71
5. Per Suction Unit; Air Generated Unit	0
O. Factories, Industries:	
1. Per Employee	19
2. Per Employee, with Showers	26
3. Per Employee, with Kitchen	30
4. Per Employee, with Showers and Kitchen	34
P. Fairgrounds: (Average Attendance, Per Person)	4
Q. Grocery Stores: (Per Person, No Restaurant or Food Preparation)	19
R. Hospitals:	
1. Per Resident Staff	75
2. Per Bed	150
S. Hotels: (Per Bedroom, No Restaurant)	75
T. Institutions: (Per Resident)	75
U. Laundries: (Self Service, Per Machine)	300
V. Marinas: (Per Slip)	23
W. Mobile Homes: (Per Unit)	225
X. Motels: (Per Unit, No Restaurant)	75
Y. Nursing Homes:	
1. Per Bed	75
2. Per Bed, with Laundry	113
Z. Offices, Small Stores, Business, Administration Buildings: (Per Person, No Restaurant)	19
AA. Picnic Parks: (Average Attendance, Per Person)	8
BB. Prison/Jail:	
1. Per Employee	11
2. Per Inmate	94
CC. Residences: (Per House, Unit)	300
DD. Rest Areas, Welcome Centers:	

1. Per Person	4
2. Per Person, with Showers	8
EE. Rest Homes:	
1. Per Bed	75
2. Per Bed, with Laundry	113
FF. Restaurants:	
1. Fast Food Type, Not Twenty Four (24) Hours (Per Seat)	30
2. Twenty Four (24) Hour Restaurant (Per Seat)	53
3. Drive-In (Per Car Service Space)	30
4. Vending Machine, Walk-up Deli or Food Preparation (Per Person)	30
GG. Schools, Day Care:	
1. Per Person	8
2. Per Person, with Cafeteria	11
3. Per Person, with Cafeteria, Gym and Showers	15
HH. Service Stations:	
1. Per Employee	8
2. Per Car Served	8
3. Car Wash (Per Car Washed)	56
II. Shopping Centers, Large Department Stores, Malls: (Per Person, No Restaurant)	19
JJ. Stadiums, Coliseums: (Per Seat, No Restaurant)	4
KK. Swimming Pools: (Per Person, with Sewer Facilities and Showers)	8
LL. Theaters: Indoor (Per Seat), Drive In (Per Stall)	4

Customer No.: \_\_\_\_\_

**PALMETTO OF RICHLAND COUNTY LLC COMMERCIAL CUSTOMER INSPECTION CHECKLIST**

Customer Name: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

Service Address: \_\_\_\_\_  
\_\_\_\_\_

Name of Customer Representative Interviewed And Position: \_\_\_\_\_ (Name) \_\_\_\_\_ (Title)

Type of Establishment: \_\_\_\_\_ (Insert here alphabetic designation from list of establishments in Appendix A of R.61-67.300.H, CATEGORIES A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space. )

Notes: \_\_\_\_\_  
\_\_\_\_\_

Equivalency Factors: \_\_\_\_\_ (Insert here hydraulic loading factors from Appendix A of R. 61-67.300.H applicable to type of establishment; if more than one designation applies, provide factors for each designation.)  
\_\_\_\_\_

**GREASE TRAPS**

Grease Trap Present? Y / N (circle one) (If yes, note location at customer service premises: \_\_\_\_\_.)

Grease Trap Required? Y / N (circle one) (Where a grease trap is required, provide customer with a copy of the Alpine Fats, Oils and Grease standards.)

Grease Trap Condition: \_\_\_\_\_ (Insert here "poor, fair or good.")

Last pump date: \_\_\_\_\_

Grease Trap Comply with Alpine construction standards? Y / N (circle one)

Waste Oil Recycling at customer premises: Y / N (circle one)

**SATELLITE SEWERS**

Satellite Sewer System Present? Y / N

Connection description: \_\_\_\_\_  
(For example, customer sanitary sewer collection system, stormwater, roof drain, sump pump, etc.)

Authorized connection: Y / N

System and Connection Condition: \_\_\_\_\_ Insert here "poor, fair or good.")

Observed System or Connection Deficiencies: \_\_\_\_\_ (Describe here any problems with connection or system.)  
\_\_\_\_\_  
\_\_\_\_\_

**OTHER**

Note here any other observations, questions or issues arising out inspection, including customer questions or comments.  
\_\_\_\_\_  
\_\_\_\_\_

**REVIEWED:** \_\_\_\_\_ (Insert reviewer initials and date.)

Operations: \_\_\_\_\_ Regulatory: \_\_\_\_\_

Accounting: \_\_\_\_\_ PR: \_\_\_\_\_

**CUSTOMER REQUESTED / PROVIDED COPY:** Y/N

**PALMETTO OF RICHLAND COUNTY, LLC SHOPPING CENTER SUPPLEMENTAL CHECKLIST**

Shopping Center Name: \_\_\_\_\_

Location Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Exterior Square Footage: \_\_\_\_\_ Measurement Method: \_\_\_\_\_ (Measuring wheel, tape, customer supplied, building records, tax records, etc.)

Number of Separate Units in Shopping Center: \_\_\_\_\_

Names of tenants/stores:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

(If more than 8 separate tenants, attach separate sheet)

Tenant Contact Information:

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

(If more than 8 separate tenants, attach separate sheet)

Tenant Type of Establishment:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

(Insert here alphabetic designation from list of establishments in Appendix A of R.61-67, A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space.)

(If more than 8 separate tenants, attach separate sheet)

- Equivalency Factors:
1. \_\_\_\_\_
  2. \_\_\_\_\_
  3. \_\_\_\_\_
  4. \_\_\_\_\_
  5. \_\_\_\_\_
  6. \_\_\_\_\_
  7. \_\_\_\_\_
  8. \_\_\_\_\_

(Insert here hydraulic loading factors from Appendix A of R. 61-67 applicable to type of tenant establishment; If more than one alphabetic designation applies, provide factors for each designation.)

(If more than 8 separate tenants, attach separate sheet)

Outparcel buildings on site? Y / N (circle one)

If yes, list all outparcel buildings by occupant name and confirm separate inspection performed by checking space below.

_____	Separate inspection _____
_____	Separate inspection _____
_____	Separate inspection _____
_____	Separate inspection _____

**REVIEWED:** (Insert reviewer initials and date.)

\_\_\_\_\_

Regulatory: \_\_\_\_\_

Accounting: \_\_\_\_\_

PR: \_\_\_\_\_

**CUSTOMER REQUESTED / PROVIDED COPY:**

Y / N



PALMETTO OF RICHLAND COUNTY, LLC  
1710 WOODCREEK FARMS ROAD  
ELGIN, SC 29045  
OFFICE: 803-699-2422; FAX: 803-699-6923  
WWW.NIAMERICA.COM

April 24, 2017

Dear Customer:

As your wastewater utility, Palmetto of Richland County LLC ("PRC") is conducting an inspection of your sewerage connections and premises for purposes of an upcoming rate relief proceeding before the Public Service Commission of South Carolina and ascertaining the applicability of and compliance with certain of our regulations and policies pertaining to commercial customer service locations.

The person bearing this letter is a duly authorized representative of PRC and is authorized to inspect your premises under Public Service Commission regulation 103-537, a copy of which is attached. We ask that you cooperate with our representative during this inspection, including providing information that may be requested.

We very much appreciate your cooperation in this matter. Should you have any questions, or need additional information, please do not hesitate to contact me at the telephone number or my email address shown below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark S. Daday", with a long, sweeping flourish extending to the right.

Mark S. Daday, Chief Financial Officer  
Email: [mdaday@niamerica.com](mailto:mdaday@niamerica.com)  
Telephone: 803-995-5054

CHAPTER 103.

PUBLIC SERVICE COMMISSION

(Statutory Authority: 1976 Code Sections 58-3-140, 58-23-10, 58-23-590, 58-23-1010, and 58-23-1830)

**103-537. Right of Access.**

A. The authorized agents of the utility shall have the right of access to the customer's premises, at reasonable hours, for the purpose of inspecting the customer's sewerage connections and for any other purpose which is proper and necessary in the conduct of the utility's business.

B. When a sewerage line which is property of a utility is on the property of a resident in the utility's service area which is on file with the ORS, the resident shall provide reasonable access to the utility for maintenance thereof. Any damage done to the property by the utility shall be corrected by the restoration of comparable grass, shrubbery, and trees from nursery stock to conform with the condition before the maintenance process began.

HISTORY: Amended by State Register Volume 31, Issue No. 5, eff May 25, 2007.